

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

ASHLEY WILSON, Individually and on  
behalf of all others similarly situated,

Plaintiff,

v.

PELOTON INTERACTIVE, INC., JOHN  
FOLEY, AND JILL WOODWORTH,

Defendants.

Case No.: 1:21-cv-02369-CBA

Hon. Carol Bagley Amon

LEIGH DRORI, Individually and on behalf of  
all others similarly situated,

Plaintiff,

v.

PELOTON INTERACTIVE, INC., JOHN  
FOLEY, and JILL WOODWORTH,

Defendants.

Case No.: 1:21-cv-02925-KAM

Hon. Kiyo A. Matsumoto

**NOTICE OF MOTION OF DREW H. BROWN, SR., JENNIFER PHUNG, AND  
DAVID C. MILLHISLER FOR CONSOLIDATION OF THE ACTIONS,  
APPOINTMENT AS CO-LEAD PLAINTIFFS, AND APPROVAL  
OF SELECTION OF COUNSEL**

**TO THE CLERK OF THE COURT, ALL PARTIES AND THEIR RESPECTIVE  
ATTORNEYS OF RECORD:**

**PLEASE TAKE NOTICE** that Drew H. Brown, Sr., Jennifer Phung, and David C. Millhisler (“Movants”) respectfully move this Court for an order: (1) consolidating the above-captioned related actions (the “Actions”), (2) appointing Movants as Co-Lead Plaintiffs pursuant to §21D of the Securities Exchange Act of 1934 (“Exchange Act”), as amended by the Private Securities Litigation Reform Act of 1995 (the “PSLRA”), and (3) approving Movants’ selection of Levi & Korsinsky, LLP as Lead Counsel for the Class.

Movants seek consolidation of the Actions, appointment as co-lead plaintiffs, and approval of their choice of counsel pursuant to the Securities Exchange Act of 1934, the Federal Rules of Civil Procedure, and the PSLRA. This motion is based on this notice, the attached Memorandum of Law, the Declaration of Shannon L. Hopkins in support thereof, and the Court's complete files and records in these actions, as well as such further argument as the Court may allow at a hearing on this motion.

Dated: June 28, 2021

Respectfully Submitted,

**LEVI & KORSINSKY, LLP**

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*Lead Counsel for Drew H. Brown, Sr.,  
Jennifer Phung, and David C. Millhisler,  
and [Proposed] Lead Counsel for the Class*